

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL P. AND SHELLIE GILMOR,)
)
)
)
Plaintiffs,)
)
)
v.) **Case No. 4:10-cv-00189-ODS**
)
)
PREFERRED CREDIT CORPORATION,)
et al.,)
)
)
Defendants.)

**DEFENDANTS RESIDENTIAL FUNDING COMPANY, LLC AND JPMORGAN
CHASE BANK, NA, AS FORMER TRUSTEE'S UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME IN WHICH TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS' SEVENTH AMENDED COMPLAINT**

COME NOW Defendants Residential Funding Company, LLC and JPMorgan Chase Bank, NA, as Former Trustee (collectively "Moving Defendants"), by and through counsel, and move the Court for an Order extending the time in which to answer or otherwise respond to Plaintiffs' Seventh Amended Complaint ("Complaint") by sixty (60) days to, and including, August 12, 2011. In support of this Motion, Moving Defendants state as follows:

1. Absent extension, Moving Defendants' responses to Plaintiffs' Complaint are due to be filed on or before June 13, 2011.
2. In accordance with the applicable rules, Moving Defendants have conferred in good faith with Plaintiffs' counsel Fred Walters concerning the requested extension and Mr. Walters is agreeable to the requested extension.
3. This Motion is not filed for the purpose of delay or harassment, but rather to avoid the unnecessary expense of responding to the Petition, because Plaintiffs and Moving Defendants have agreed in principal to settle Plaintiffs' claims against Moving Defendants. Plaintiffs and

Moving Defendants reasonably expect to file a motion for preliminary approval of the settlement before August 12, 2011.

4. The proposed extension will not cause prejudice to any party.

WHEREFORE, Defendants Residential Funding Company, LLC and JPMorgan Chase Bank, NA, as Former Trustee move this Court for an extension of time, up to and including August 12, 2011, in which to answer or otherwise respond to Plaintiffs' Seventh Amended Complaint.

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ Catesby A. Major
Craig S. O'Dear MO #30167
Irvin V. Belzer MO #25234
Catesby A. Major MO #56944
3500 One Kansas City Place
1200 Main Street
Kansas City, MO 64105-2100
Telephone: (816) 374-3200
Facsimile: (816) 374-3300

and

Michael G. Biggers MO #24694
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750
Telephone: (314) 259-2000
Facsimile: (314) 259-2020

ATTORNEYS FOR DEFENDANTS
RESIDENTIAL FUNDING COMPANY, LLC
AND JPMORGAN CHASE BANK, NA, AS
FORMER TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2011, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Catesby A. Major

Attorney for Defendants Residential Funding
Company, LLC and JPMorgan Chase Bank,
NA, as Former Trustee